

Anthony H. Handal (appearance Pro Hac Vice)  
 David Dushane SBN 222421  
 HANDAL & MOROFSKY LLC  
 83 East Avenue, Third Floor  
 Norwalk, CT 06851  
 handal@handalglobal.com

*Attorneys for Plaintiff*  
*Sebastian Brown Productions,*  
*LLC.*

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION**

SEBASTIAN BROWN PRODUCTIONS, )	Case No.: 5:15-CV-01720-LHK	
LLC., )		
	)	
Plaintiff, )		<b>MOTION TO</b>
	)	<b><u>WITHDRAW</u></b>
-against- )		
	)	
MUZOOKA INC. ET AL., )		
	)	
Defendants. )		
	)	
	)	
	)	
_____ )		

**MOTION TO WITHDRAW**

PLEASE TAKE NOTICE that, on \_\_\_\_\_, 2016, at \_\_\_\_\_, or  
 as soon thereafter as the matter may be heard before the Hon. Lucy H. Koh, the  
 undersigned law firm Handal & Morofsky LLC and its attorneys Anthony H. Handal  
 and David Dushane (collectively "Counsel") shall and hereby do respectfully seek leave  
 of this Court, pursuant to LOCAL R. 11-5(a) and in compliance with CAL. R. PROF.

1 CONDUCT 3-700, to withdraw as counsel for Plaintiff Sebastian Brown Productions,  
2 LLC.

3 There are irreconcilable differences between Plaintiff and its Counsel that make it  
4 impossible for Counsel to continue to prosecute this case diligently.

5 **MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFF**

6 Pursuant to LOCAL R. 11-5, Counsel ("Movant") hereby notifies the  
7 parties and the Court of their intent to withdraw as counsel for Plaintiff. Movant  
8 states the following grounds for this notice and motion:  
9

10 1. Movant has represented the Plaintiff since the filing of this action.

11 2. Irreconcilable differences respecting the conduct of the above captioned action  
12 have arisen between Counsel and Plaintiff. Such irreconcilable differences make it  
13 impossible for Counsel to continue to prosecute this action diligently.  
14

15 3. Movant's withdrawal will not cause any prejudice or significant delay in this  
16 case. The present action is at an early stage, an amended complaint having been filed in  
17 late July, 2016.  
18

19 4. Plaintiff was informed of the possibility of withdrawal and subsequently told  
20 Movant that it can withdraw.

21 THEREFORE, Movant respectfully requests that this Court waive oral argument  
22 on this Motion, grant Counsel leave to withdraw as counsel in the above-captioned  
23 matter, and enter an order stating that Movant has so withdrawn.  
24

25 Respectfully submitted,

26 Dated: August 18, 2016

HANDAL & MOROFSKY LLC

27 /s/ Anthony H. Handal  
28

Anthony H. Handal (appearance Pro Hac Vice)  
David Dushane  
HANDAL & MOROFSKY LLC  
83 East Avenue Third Floor  
Norwalk, CT 06851  
Telephone (917) 880-0811  
handal@handalglobal.com

*Attorneys for Plaintiff*  
*Sebastian Brown Productions,*  
*LLC.*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 18, 2016, I electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused to be served copies of the foregoing document and associated declaration on August 16, 2016, upon the following in the manner indicated:

Otto O. Lee  
INTELLECTUAL PROPERTY LAW GROUP LLP  
12 South First Street, 12th Floor  
San Jose, CA 95113  
VIA ELECTRONIC MAIL: Kevin Viau ([kviau@iplg.com](mailto:kviau@iplg.com)); olee@iplg.com

/s/ Anthony H. Handal  
Anthony H. Handal (appearance Pro Hac Vice)